

BNY Mellon Center 500 Grant Street Suite 2500 Pittsburgh, PA 15219 Tel (412) 391-1334 Fax (412) 391-6984 www.foxrothschild.com

JOHN C. HANSBERRY Direct No: 412.394.5539 Email: JHansberry@FoxRothschild.com

April 29, 2021

VIA ECF

Hon. Miroslav Lovric United States Magistrate Judge Federal Building and U. S. Courthouse 15 Henry Street Binghamton, NY 13901

Re: Car-Freshner Corporation, et al. v. Dick's Sporting Goods, Inc., et al.

Civil Action No. 5:20-cv-00526

Dear Magistrate Judge Lovric:

Defendant, DICK's Sporting Goods, Inc. ("DICK's") writes briefly in response to Plaintiffs' letter filed today regarding an extension.

DICK's consents to a one-week extension. However, the search term issue was resolved before the status conference, as Plaintiffs reported to the Court during the April 16 status conference. There is nothing to compel with respect to Rule 30(b)(6) Topics 2-4 because DICK's identified and offered a witness on those topics, also before the last status conference. DICK's statement regarding the search for the design file was circulated on April 28, in accordance with the time frame the parties agreed to during the meet and confer. DICK's agrees that some additional time is needed for the parties to review and resolve the issue.



Hon. Miroslav Lovric April 29, 2021 Page 2

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/John C. Hansberry
John C. Hansberry

JCH/ebk